

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TRUTEK CORP.,

Case No. 2:21-cv-10312

Plaintiff,

Hon. Stephen J. Murphy, III

v.

BLUEWILLOW BIOLOGICS, INC.,

Defendants.

**PLAINTIFF TRUTEK CORP.'S WITNESS LIST
AS OF MAY 13, 2022**

As mandated by the Court's Scheduling Orders (ECF 21 and ECF 26), Plaintiff Trutek Corp ("Trutek") by and through counsel, Law Office of Stanley H. Kremen, Esq. and the Law Office of Keith Altman, hereby states that the following witnesses may be called at trial:

1. Ashok Wahi
2. Alexei Ermakov, Ph.D.
3. Shane Burns
4. Troy Anthony
5. Edward A. Lemmo, Ph.D.
6. Dennis M. O'Donnell, R.Ph.

7. At least one additional expert to testify regarding damages.
8. At least one additional expert to testify regarding patent validity.
9. At least one expert who will rebut expert disclosures and testimony presented by BlueWillow Biologics, Inc. ("BlueWillow").
10. James R. Baker, Jr.
11. Current and former BlueWillow employees and consultants knowledgeable regarding BlueWillow products, including Nanobio Protect and various vaccines under development.
12. Individuals currently and formerly associated with the University of Michigan knowledgeable about transfer of technology developed at the University that was transferred to BlueWillow either by license or other means.
13. Inventors, authors, and/or others with knowledge of prior art references.
14. Inventors listed on patents and patent applications related to vaccine technology and assigned either to the Regents of the University of Michigan or Nanobio Corporation.
15. All persons or entities referred to in depositions, interrogatories, answers to interrogatories, or requests for documents in this action.
16. Any person listed as a possible witness by Defendants.
17. All witnesses necessary for rebuttal; and
18. All custodians necessary to authenticate documents.

Discovery and fact investigation remain ongoing in this action. Expert discovery and disclosures have not yet started. Plaintiff reserves the right to name additional witnesses as their identities, the subject of their knowledge, or the relevance of such knowledge become known. If it appears that additional

witnesses will or may be called to testify at trial, Trutek will report their names to Defendant. This restriction does not apply to rebuttal witnesses.

Dated: May 13, 2022

Respectfully submitted,

/s/ Stanley H. Kremen
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Attorneys for Plaintiff

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CERTIFICATE OF SERVICE

I certify that on May 13, 2022, I served the foregoing Plaintiff Trutek Corp.'s Witness List upon all parties herein by filing copies of same using the Court's ECF Filing System.



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